IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:	§ Group Art Unit: 2192
	§
Gary Cole	§ Examiner: Yigdall, Michael J.
	§
	§ Atty. Dkt. No.: 5681-96802
	§ SUN040712
Serial No. 10/006,089	§
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	§
Filed: December 6, 2001	§
	§
For: System and Method for	§
Managing Information	§
Objects	§

AMENDED APPEAL BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir/Madam:

This Amended Appeal Brief is filed to correct a typographical error in the Grounds of Rejection to be Reviewed on Appeal section, as required by the Notification of Non-Compliant Appeal Brief mailed May 9, 2008. Appellant respectfully requests that the Board of Patent Appeals and Interferences consider this appeal.

I.   REAL PARTY IN INTEREST

The real party in interest is Sun Microsystems, Inc., a corporation organized and existing under and by virtue of the laws of the State of Delaware, and having its principal place of business at 4150 Network Circle, Santa Clara, CA 95054.

II. RELATED APPEALS AND INTERFERENCES

No other appeals, interferences or judicial proceedings are known which would be related to, directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III.   STATUS OF CLAIMS

Claims 1-4, 6, 8-12 and 14-33 stand finally rejected.   Claims 5, 7 and 13 are canceled.   The rejection of claims 1-4, 6, 8-12 and 14-33 is being appealed.   A copy of claims 1-4, 6, 8-12 and 14-33 is included in the Claims Appendix herein below.

IV.   <u>STATUS OF AMENDMENTS</u>

No amendments have been submitted subsequent to the final rejection.

V.   SUMMARY OF CLAIMED SUBJECT MATTER

Appellants claimed invention relates to a system and method for managing information on a network using an identity index. As described in Appellants' specification, an identity index may store information mapping information objects describing a particular user to that user. According to one embodiment, an administrative system may include a management system that maintains an identity index associating users with information objects and resources. An information object may be a collection of individual pieces of data that represent a single entity or identity, such as a user. For example, a single user may have different accounts on different types of systems and an identity index may maintain information regarding those accounts and associate the information objects (i.e. account information) with a single logical name that represents the virtual identity of the user. Alternatively, in another embodiment, an identity index may associate routing tables on various servers with a particular network element. Thus, the identity index may maintain and associate disparate information regarding a single entity or identity. An identity index may be maintained using any of various data storage schemes, such as sequential files, indexed files, LDAP directories, or relational databases.

In various embodiments, a virtual identity may be maintained for human users, a programmatic entity or a computer system that uses resources, such as a system or application accessible via a network that defines information objects. *See, e.g.*, FIG 1-4; paragraphs 12, 24, 27, 28, 30, 32, 33-36, 38, 44 and 48-50. For example, a Unix system, a Windows system, or a database system may each be a resource that defines accounts as information objects. A resource may include a particular computer system, either distributed or not, an application on a computer system, or an application distributed across multiple computer systems, according to different embodiments. Each resource may define information objects related to the management or configuration of an associated resource. Resource accounts, or information objects, may represent each resource's view of the associated identity. In other words, each resource definition may represent the user within the scope of the resource. *See, e.g.*, FIG 1-4; paragraphs 12-14, 27, 29, 34, 37, 39, 40, 44 and 47-50.

One embodiment of an identity index is illustrated in Appellant's FIG. 3. The identity index includes a virtual identity (e.g., 312). The virtual identity includes multiple of information object identifiers (e.g., 350) each corresponding to a respective information object (e.g., 342, 344 and 346). The virtual identity also includes, for each information object, a resource name (e.g., Reso01, Reso02 (353) and Reso03) identifying a resource (210, 212 and 214) at which the respective information object is located, wherein the resource name is associated with the respective information object identifier (e.g., JANE_D, janed (352) or JaneD). The identity index further includes and resource definitions (e.g., 360, 362 and 364), each of which includes connection information (e.g., 368). Thus, as illustrated by FIG. 3, a single virtual identity may include information objects that represent the virtual identity, such as on different resources or systems.

Independent claim 1 is directed to a system for managing information including a software program stored on a computer-readable medium operable to maintain an identity index (e.g., FIG. 2 and 3, item 250; p. 5, lines 7-12; p. 8, lines 4-10; 21-31; p. 10, lines 9-22; p. 11, lines 6-31; p. 15, lines 6-26; p. 15, line 27 – p. 16, line 9; p. 16, lines 21-28) that includes a virtual identity (e.g., FIG. 3, items 312, 314 and 315; p. 5, lines 9-14; p. 8, lines 6-11; p. 9, lines 13-15; p. 11, lines 6-14 and lines 18-21) for a user (e.g., p. 9, lines 6-7) of multiple computer resources (e.g., FIG. 2 and 4, items 210, 212 and 214; p. 5, lines 9-19; p. 8, lines 6-16; 22-27; p. 8, line 28 – p. 9, line 6; p. 9, lines 17-32; p. 10, lines 1-8; p. 10, line 30 – p. 11, line 5; p. 11, line 22-30; p. 13, lines 6-26).

The virtual identity recited in claim 1 includes a plurality of information object identifiers (e.g., FIG. 3, item 352; p. 11, lines 12-22), each corresponding to a respective information object (e.g., FIG. 3, items 350; p. 9, lines 7-9; p. 10, lines 23-29; p. 11, lines 6-22). The virtual identity also includes, for each information object, a resource name (e.g., FIG. 3, item 353; p. 5, lines 9-14; p. 8, lines 6-11; p. 11, lines 6-22) identifying one of the multiple computer resources at which the respective information object is located, where the resource name is associated with the respective information object identifier, as recited in claim 1.

The virtual identity of claim 1 also includes a resource definition (e.g., FIG. 3, item 360, 362 and 362; p. 5, 14-24; p. 8, 11-21; p 11, line 23 – p. 14, line 3) corresponding to each respective named computer resource, where the resource definition also includes connection information (e.g., p. 5, lines 15-19; p. 8, lines 12-16; p. 11, lines 23 – p. 13, line 26).

Independent claim 20 is directed to a system for managing information including a software program stored on a computer readable medium operable to maintain an identity index (e.g., FIG. 2 and 3, item 250; p. 5, lines 7-12; p. 8, lines 4-10; 21-31; p. 10, lines 9-22; p. 11, lines 6-31; p. 15, lines 6-26; p. 15, line 27 – p. 16, line 9; p. 16, lines 21-28). The identity index of claim 20 includes a plurality of virtual identities (e.g., FIG. 3, items 312, 314 and 315; p. 5, lines 9-14; p. 8, lines 6-11; p. 9, lines 13-15; p. 11, lines 6-14 and lines 18-21), where each virtual identity corresponds to a user (e.g., p. 9, lines 6-7) of multiple computer resources (e.g., FIG. 2 and 4, items 210, 212 and 214; p. 5, lines 9-19; p. 8, lines 6-16; 22-27; p. 8, line 28 – p. 9, line 6; p. 9, lines 17-32; p. 10, lines 1-8; p. 10, line 30 – p. 11, line 5; p. 11, line 22-30; p. 13, lines 6-26).

Additionally, each virtual identity of claim 20 includes a plurality of information object identifiers (e.g., FIG. 3, item 352; p. 11, lines 12-22), each corresponding to a respective information object (e.g., FIG. 3, items 350; p. 9, lines 7-9; p. 10, lines 23-29; p. 11, lines 6-22).

Each virtual identity also includes a plurality of resource names (e.g., FIG. 3, item 353; p. 5, lines 9-14; p. 8, lines 6-11; p. 11, lines 6-22), each associated with an information object identifier and corresponding to one of the multiple computer resources at which the information object corresponding to the associated information object identifier is located. The identity index of claim 20 also includes multiple resource definitions (e.g., FIG. 3, item 360, 362 and 362; p. 5, 14-24; p. 8, 11-21; p 11, line 23 – p. 14, line 3) including a resource definition for each named computer resource, where each resource definition includes connection information (e.g., p. 5, lines 15-19; p. 8, lines 12-

16; p. 11, lines 23 – p. 13, line 26) for the corresponding named resource.

Independent claim 26 is directed to a method for managing information comprising storing an identity index (e.g., FIG. 2 and 3, item 250; p. 5, lines 7-12; p. 8, lines 4-10; 21-31; p. 10, lines 9-22; p. 11, lines 6-31; p. 15, lines 6-26; p. 15, line 27 – p. 16, line 9; p. 16, lines 21-28) including multiple information object identifiers (e.g., FIG. 3, item 352; p. 11, lines 12-22) corresponding to a set of information objects (e.g., FIG. 3, items 350; p. 9, lines 7-9; p. 10, lines 23-29; p. 11, lines 6-22) that define a user (e.g., p. 9, lines 6-7) of multiple computer resources (e.g., FIG. 2 and 4, items 210, 212 and 214; p. 5, lines 9-19; p. 8, lines 6-16; 22-27; p. 8, line 28 – p. 9, line 6; p. 9, lines 17-32; p. 10, lines 1-8; p. 10, line 30 – p. 11, line 5; p. 11, line 22-30; p. 13, lines 6-26).

The method of claim 26 also includes associating a resource definition (e.g., FIG. 3, item 360, 362 and 362; p. 5, 14-24; p. 8, 11-21; p 11, line 23 – p. 14, line 3) with each information object identifier, where each resource definition corresponds to a different one of the multiple computer resources at which the information object corresponding to the associated information object identifier is located and where each resource definition contains connection information (e.g., p. 5, lines 15-19; p. 8, lines 12-16; p. 11, lines 23 – p. 13, line 26) for the corresponding computer resource.

The summary above describes various examples and embodiments of the claimed subject matter; however, the claims are not necessarily limited to any of these examples and embodiments. The claims should be interpreted based on the wording of the respective claims.

VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1.   Claims 1-4, 6, 8-12 and 14-33 stand finally rejected under 35 U.S.C. § 103(a) as unpatentable over Hoover et al. (U.S. Patent 5,724,575) (hereinafter "Hoover") in view of Dutcher et al. (U.S. Patent 6,269,405) (hereinafter "Dutcher").

VII.   ARGUMENT

Claims 1-4, 6, 8-12 and 14-33 stand finally rejected under 35 U.S.C. § 103(a) as being unpatentable over Hoover et al. (U.S. Patent 5,724,575) in view of Dutcher et al. (U.S. Patent 6,269,405).   Appellants traverse this rejection for at least the following reasons. Different groups of claims are addressed under their respective subheadings.

Claims 1-4, 6, 9-12, 14, 16, 18, 20, 21, 23-29 and 31-33:

1.   Hoover in view of Dutcher fails to teach or suggest an identity index including a virtual identity as recited in Applicants' claim.

Regarding claims 1, 20 and 26, Hoover in view of Dutcher fails to teach or suggest an identity index that includes a virtual identity that is for a user of multiple computer resources and includes a plurality of information object identifiers each corresponding to a respective information object; and for each information object, the virtual identity includes a resource name identifying one of **the** multiple computer resources at which the respective information object is located. The Examiner argues that Hoover "teaches a virtual identity is for a user" (Final Action, p. 3 and Advisory Action, p. 2).   The Examiner relies on Hoover's homogenous data model interfacing over multiple, heterogeneous, remote data collections and providing an object broker that stores location and status information regarding the remote data combined with Dutcher's teaching regarding updating remote user accounts based on user account information on a central server.   However, Hoover and Dutcher, whether considered singly or in combination, do not teach or suggest the limitations of claim 1.

At the Examiner's cited passage, Hoover describes a PERSON object attribute table located at computers respectively associated with an insurance company, an employer, a hospital and a PPO/HMO/TPA. Applicants respectfully disagree with the Examiner's interpretation of Hoover. The Examiner is confusing Hoover's *data about people* (e.g., patent health care information) with a virtual identity for a *user of multiple*

computer resources that includes a resource name identifying one of **the** multiple computer resources at which the respective information object is located.

According to claim 1, the resource name in the virtual identity must identify one of **the** multiple computer resources (i.e., one of the computer resources identified in "a virtual identity for <u>a user of multiple computer resources</u> ..." from Applicants' claim). Such a virtual identity is not taught or suggested by the cited art, whether considered singly or in combination. **In contrast, Hoover specifically states that the users of the databases are not the people whose information is stored in the databases.**

Hoover teaches a system in which data regarding various subjects, such as health care information, is distributed over various, heterogeneous data collections. Hoover's system overlays a homogenous data model over the multiple, heterogeneous, remote data collections and provides an object broker that stores location and status information regarding the remote data. Hoover's system allows users of the databases to access new data sources as they come online, without requiring the users (or the users' computers) to know the routing address or other identifying information about the new data source. Hoover describes his system using an exemplary health care system. The data stored in Hoover's system relates to the patients of a health care system, and not to a user of multiple computer resources. In Hoover, the users of the computer resources (e.g., the computer system on which Hoover's data collections reside) are the employees of the healthcare-related service providers (Hoover, col. 27, lines 25-55; col. 45, line 46 – col. 46, line 19; and col. 47, line 55 – col. 48, line 3). For instance, Hoover states, regarding the add_PERSON message, that data regarding the user of the system "is of course unrelated to the information associated with the person whose demographics are being added" (col. 29, lines 46-57). Thus, Hoover explicitly teaches that the user of the resources (the data sources on the remote computers) is **not** the person that is associated with any particular object identity or object attribute.

2. **The Examiner's interpretation of the Hoover's account information is incorrect.**

The Examiner is mischaracterizing Hoover's system. As shown above, Hoover specifically and explicitly states that the information stored in the database is not for, about, or even related to, the healthcare professionals that use the databases (Hoover, col. 29, lines 46-57). Thus, rather than the information "not necessarily describe[ing] the actual users or 'operators' of the databases" as the Examiner states, in fact, the information stored in the database *specifically* does <u>not</u> have anything to do with the actual *users* of the database. Nor would it make sense to combine information for Hoover's actual users with the patient information stored in the databases.

Hoover is concerned with storing, maintaining and accessing patient healthcare-related information and is not concerned with managing multiple computer user accounts. The Examiner also asserts that Hoover's "information objects comprise user accounts" (Final Action, p. 3), citing col. 27, lines 43-49 and arguing that Hoover's "information object … comprises a person's account with an insurance company, health maintenance organization, etc." (Final Action, p. 3). The Examiner incorrectly equates any person with a business-style account (e.g., health insurance, etc.) with, specifically, a computer user of a database storing information about such accounts. Just because information is about a person, does not mean that the person can be considered a *user* of the computer systems and resources on which that data is stored. Furthermore, as noted above, **the teachings of Hoover directly contradict the Examiner's position**.

In fact, Hoover specifically states that the users of the databases are not the people whose information is stored in the databases. For instance, Hoover describes an example in which a new record is added in a remote database by using an add_PERSON message. The add_PERSON message may include a security password of the computer user initiating the new record. Hoover specifically states that the MyPassword parameter of the add_PERSON message "indicates a security password for the user initiating the operation, *which is of course unrelated to the information associated with the person*

whose demographics are being added" (Emphasis added, Hoover, column 29, lines 46-57). Thus, Hoover explicitly teaches that the user of the resources (the data sources on the remote computers) is **not** the person that is associated with any particular object identity or object attribute. Therefore, Hoover's system does not include, nor does Hoover disclose, a virtual identity for a user of one or more resources and that includes a resource name, for each information object, that identifies one of the one or more resources (used by the user) at which the respective information object is located, as recited in Applicants' claim.

3. Dutcher does not overcome the deficiencies of Hoover.

Dutcher's system, even if combined with Hoover's, does not suggest a virtual identity as recited in Applicants' claim and therefore does not overcome Hoover's deficiencies regarding a virtual identity, as recited in Applicants' claim. Instead, Dutcher teaches a system for establishing and synchronizing associated user accounts on managed servers based on user account information on a central server. Dutcher's system does not include, nor does the Examiner cite, any data structure that can be considered a virtual identity for a user of multiple computer resources that includes, among other things, a resource name identifying one of the multiple computer resources at which the respective information object is located.

Dutcher teaches that user accounts on the managed servers are synchronized with those on the central server. Dutcher is not concerned with, nor does Dutcher teach, any sort of particular data structure or arrangement for the user accounts. Furthermore, there is no need for a virtual identity as recited in Applicants' claim in Dutcher's system (or in Hoover's system). Dutcher teaches the user of a managed service on a managed server that receives user account updates and synchronizes a local database of user accounts with those received from the central server (Dutcher, col. 7, lines 15-34 and 39-59). In other words, Dutcher teaches that changes to a set of user accounts, such as user names and passwords, are sent from a central server to a managed server and that a managed service on the managed server then compares the updates to the user accounts on the managed server in order to synchronized them with the central server. No sort of virtual

identity, such as that recited in claim 1, is requires, included or suggested by Dutcher's system.

The Examiner relies on Hoover teaching that "information objects comprise user accounts", citing col. 27, lines 43-49, to combine with Dutcher's teachings regarding "managing different user accounts on multiple, heterogeneous computer resources based on a single user account definition" (Final Action, p. 3). However, as noted above Hoover's information object include information about people, but not about the users of the computer resources (e.g., the users of Hoover's system). The user accounts of Dutcher do not have anything to do with, nor suggest any changes to, Hoover's healthcare information databases that store information regarding people, such as health care patients. As expressly stated by Hoover, the information stored in Hoover's remote databases does not include account information for the users of the system. Dutcher's teaching regarding managing different *user accounts* does not have anything to do with Hoover's heterogeneous databases.

4.   The Examiner's combination of Hoover and Dutcher does not result in a system that includes all the limitations of Applicants' claim.

Moreover, contrary to the Examiner's assertions, modifying Hoover in view of Dutcher would not change the nature or structure of Hoover's database. No combination of Hoover and Dutcher would include the virtual identity recited in Applicants' claim. Even if the user account management of Dutcher were applied to Hoover's system, the resulting system would include Hoover's homogeneous data model for healthcare information and would also include Dutcher's system of managing user account information on a central server (e.g., user accounts for the healthcare professionals using Hoover's system) to establish and synchronizes associated user accounts on other servers.

In other words, the Examiner's suggested combination of Hoover and Dutcher might manage user accounts as taught by Dutcher, but since the *actual* users of Hoover's system are not the people about which information is stored in Hoover's databases, such

a combination would not change the manner in which Hoover's system stores, manages or accesses patient healthcare information.

In the Advisory Action the Examiner contends that "the structure of Hoover's system is capable of performing Applicant's intended user of the virtual identity as 'for a user of [the] multiple computer resources" (p. 2, lines 31-34). Applicants' respectfully disagree. Hoover specifically and unequivocally teaches that his system does not store information about the user's of the database. Furthermore, the information stored in Hoover's databases does not include computer user account information which Dutcher's system relates to. The Examiner cannot simply ignore the express teachings of the cited art.

5.   There is no reason why one would combine Hoover and Dutcher as suggested by the Examiner.

The Examiner has not provided a valid reason why one would modify the system of Hoover to include the teachings of Dutcher. The Examiner states, "Dutcher describes a need for managing different user accounts on multiple, heterogeneous computer resources based on a single user account definition" and that "the teachings of Hoover enable the management of different, heterogeneous database on multiple, computer resources based on a single, homogeneous data model" (Final Action, pp. 3-4). The Examiner then concludes, "[t]herefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to implement the teachings of Hoover such that the virtual identity is 'for a user of multiple computer resources,' as Dutcher suggests" (Final Action, p. 4). However, not only does Dutcher "describe a need for managing different user accounts," Dutcher clearly provides, and in fact is solely concerned with, a system specifically for managing different user accounts. The Examiner has simply restated Dutcher's goal. The Examiner has not provided any valid reason why one would modify the healthcare database system of Hoover to include the user account synchronization system of Dutcher.

In the Advisory Action, the Examiner further argues, "one of ordinary skill in the art could, with predictable results, apply the teachings of Hoover to the user accounts of actual users of the multiple computer resources" and that "one of ordinary skill could, with predictable results, implement the virtual identity of Hoover such that it is 'for a user of the multiple computer resources," The Examiner further concludes, "In such an implementation, the resource name would identify 'one of the multiple computer resources' of which the user is an actual user" (Advisory Action, p. 2, lines 24-29). However, there is no reason why one desiring to "manage different user accounts" (i.e., the Examiner's stated reason for combining the cited art) would combine Dutcher's account management system with Hoover's healthcare database system. In fact, there is no reason why one desiring to manage different user accounts would involve Hoover's healthcare information databases at all - especially in light of the fact that Hoover's system **purposefully** does not store *user* account information.

Moreover, as noted above, if one were to modify Hoover to include Dutcher's system for managing user accounts, there is no reason why Dutcher's method would be combined with Hoover's separate information system for managing healthcare information. As Hoover states, the healthcare information is unrelated to information about the users of the system. Thus, there is simply no reason why Hoover's healthcare information would be modified according to the teachings of Dutcher.

Furthermore, even if Hoover's system were modified to store information about computer user accounts, as suggested by the Examiner, the user account information that would be stored in Hoover's database would still be *unrelated to any information about the user's of the database*, as taught by Hoover (col. 29, lines 46-57). In other words, if Hoover's system were to be used to store a homogeneous data model of user account information, *according to the teachings of Hoover* the user account information stored in the database would not include a virtual identity for a user of computer resources for which information, such as information object identifiers each corresponding to a respective information object, for each of which, the virtual identity includes a resource name identifying of the computer resources used by the user, as recited in Applicants'

claim. Thus, the Examiner's combination of Hoover in view of Dutcher is improper. A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983).

The Examiner also argues in the Advisory Action that Hoover's teachings "do not somehow preclude or prohibit storing user account information (for a user of the multiple computer resources) in the database" and that "One of ordinary skill in the art would appreciate that an administrator adding user account information to the database would provide the administrator's password, which is unrelated to the user's account, even if that user is also a user of the database." However, the Examiner's statement actually supports Applicants' argument. In the Examiner's example, the administrator is the "user of the database" and not the person whose information is being added to the database. Thus, even in the Examiner's example, no information about the actual *user* of the computer resource is added to the database. Furthermore, the Examiner's supposition that one of ordinary skill would look to Hoover's healthcare information system as a means to manage the multiple computer user accounts of Dutcher is mere hindsight based on Applicants' claimed invention. As noted above, there is simply no reason why someone would modify Hoover to store computer user account information - rather than patient healthcare information – according to Dutcher, when Dutcher's system already performed the supposed goal (i.e., managing multiple computer user accounts).

Claims 8, 15, 22 and 30:

Hoover in view of Dutcher fails to teach or suggest wherein the information object comprises a user account.

Regarding claim 8, contrary to the Examiner's assertion, Hoover in view of Dutcher does not teach or suggest wherein the information object comprises a user account. The Examiner cites column 27, lines 34-49 of Hoover. At the cited passage, Hoover describes an object attribute table that includes data attributes "indicative of the

type of data item associated with a given object" and gives an example in which a PERSON object attribute table in remote databases (Hoover, column 27, lines 26-55). Hoover teaches that the PERSON object attribute table includes personal information about the person (e.g., name, birthdate, marital status, address, etc). Thus, the Examiner's cited passage teaches Hoover's remote databases may include PERSON object attribute tables including information about a person.

However, the Examiner is again confusing *healthcare information about a person* with *user account information*. Firstly, as argued above regarding claim 1, Hoover, even in view of Dutcher, specifically teaches that the information stored in the remote database does not include information about the *users* of the computer resources accessed via Hoover's system. In fact, as noted above, Hoover specifically teaches that the information stored in the databases is unrelated to the users of the database (e.g., computer resources).

Hoover's example specifically regards the add_PERSON message (e.g., to add one of the PERSON entries of Hoover's example at the Examiner's cited passage). Regarding the add_PERSON message, Hoover teaches that data regarding the *user* of the system "is of course unrelated to the information associated with the person whose demographics are being added" (col. 29, lines 46-57). Thus, Hoover explicitly teaches that the user of the resources (the data sources on the remote computers) is **not** the person that is associated with any particular object identity or object attribute. Thus, Hoover's information object on which the Examiner relies does not include a *user account*. A person is not automatically a *user* of Hoover's system and computer resources simply because information about that person is added to Hoover's databases.

The Examiner reliance on Hoover's PERSON object attribute table is misplaced. The rejection of claim 8 is thus not supported by the cited art.

Claim 17:

Hoover in view of Dutcher fails to teach or suggest wherein said software program is operable to create a composite view of the virtual identity based on said schema map.

Contrary to the Examiner's contention, Hoover in view of Dutcher does not teach or suggest creating a composite view of a virtual identity based on a schema map. The Examiner cites column 25, lines 20-35 of Hoover. The cited passage describes gathering information from various locations and fields of Hoover's remote database in order to perform a "cross server join" of data. However, the Examiner is overlooking the fact that Hoover's teachings does <u>not</u> involve creating a composite view *of a virtual identity* as recited in Applicants' claim. Instead, Hoover teaches performing a "cross server join" to gather various pieces of information about a person whose healthcare information is stored across Hoover's distributed databases.

Hoover, even if combined with Dutcher, does not teach or suggest creating a composite view of a *virtual identity*. As noted above, the virtual identity recited in Appellants' claim is "for a user of multiple computer resources" and not simply a collection of healthcare related information as taught by Hoover. In other words, Hoover's collection or aggregate of healthcare information, as relied on by the Examiner, is not related to a virtual identity, as would be required if the Examiner's interpretation were correct.

Claim 19:

<u>Hoover in view of Dutcher fails to teach or suggest where the graphical user interface is customizable.</u>

The Examiner relies on Hoover's Update Person screen that modifies personal information about a person in Hoover's system, citing col. 52, lines 13-32. Hoover, even

in view of Dutcher, fails to mention anything about the Update Person user interface being customizable. Appellants' claim recites more than a graphical user interface. Claim 19 recites that the graphical user interface (that presents composite view of a virtual identity) is customizable. Instead, Hoover teaches that the Update Person screen "is utilized when there is a need to change information on a person already in the system" and that it is identical to the Add Person screen (Hoover, column, 52, lines 17-22). Hoover fails to mention anything about the user interfaces of the Update Person screen or the Add Person screen being customizable. Instead, Hoover simply states that the screens include "a plurality of different fields of information typically required in the health care industries in many hospital information systems" (Hoover, column 51, lines 40-60). No mention is made of the user interface being customizable, contrary to the Examiner's assertion. Furthermore, Dutcher, even if combined with Hoover, does mention anything about a user interface (that presents a composite view of a virtual identity) being customizable.

Without some teaching or suggestion by the cited art regarding a customizable graphical user interface presenting a composite view of a virtual identity, the Examiners' rejection is not supported by any evidence of record and therefore is improper.

CONCLUSION

For the foregoing reasons, it is submitted that the Examiner's rejection of claims 1-4, 6, 8-12 and 14-33 was erroneous, and reversal of his decision is respectfully requested.

The Commissioner is authorized to charge the appeal brief fee of $500.00 and any other fees that may be due to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-96802/RCK. This Appeal Brief is submitted with a return receipt postcard.

Respectfully submitted,

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VIII. CLAIMS APPENDIX

The claims on appeal are as follows.

1.   A system for managing information, comprising:

a software program stored on a computer-readable medium operable to maintain
an identity index, wherein said identity index comprises:

a virtual identity for a user of multiple computer resources, further
comprising:

a plurality of information object identifiers each corresponding to a
respective information object; and

for each information object, a resource name identifying one of the
multiple computer resources at which said respective
information object is located, wherein said resource name
is associated with said respective information object
identifier; and

a resource definition corresponding to each respective said named
computer resource, wherein the resource definition further
comprises connection information.

2.   The system of claim 1, wherein said resource definition further comprises
a schema map.

3.   The system of claim 2, wherein said schema map maps a resource attribute
from said resource to a virtual attribute defined by said schema map.

4. The system of claim 3, wherein a virtual attribute value for said virtual attribute is stored in RAM.

6. The system of claim 1, wherein said connection information contains a connection parameter selected from one of a hostname, a port, a resource username, a resource password or a resource type.

8. The system of claim 1, wherein said information object comprises a user account.

9. The system of claim 8, wherein said information object identifier comprises an account name.

10. The system of claim 8, wherein said resource definition further comprises a schema map.

11. The system of claim 10, wherein said schema map maps a resource attribute from said resource to a virtual attribute defined by said schema map.

12. The system of claim 11, wherein a virtual attribute value for said virtual attribute is maintained in RAM.

14. The system of claim 8, wherein said connection information contains a connection parameter selected from one of a hostname, a port, a resource username, a resource password or a resource type.

15. The system of claim 8, wherein said resource is one of a Unix system, a Windows NT system, a Oracle database system or an email server.

16. The system of claim 1, wherein said software program is operable to connect to said resource based on said resource definition.

17.   The system of claim 1, wherein said resource definition further comprises a schema map and wherein said software program is operable to create a composite view of said virtual identity based on said schema map.

18.   The system of claim 17, wherein said software program is operable to present a representation of said composite view in a graphical user interface.

19.   The system of claim 18, wherein said graphical user interface is customizable.

20.   A system for managing information, comprising:

a software program stored on a computer-readable medium operable to maintain an identity index, wherein said identity index comprises:

a plurality of virtual identities, wherein each virtual identity corresponds to a user of multiple computer resources, and wherein each virtual identity further comprises:

a plurality of information object identifiers, wherein each information object identifier corresponds to a respective information object; and

a plurality of resource names, wherein each resource name is associated with an information object identifier and each resource name corresponds to one of the multiple computer resources at which the information object corresponding to the associated information object identifier is located; and

a plurality of resource definitions comprising a resource definition for each named computer resource, wherein each resource definition comprises connection information for the corresponding named computer resource.

21. The system of claim 20, wherein each resource definition further comprises a schema map.

22. The system of claim 20, wherein each information object comprises a user account.

23. The system of claim 22, wherein each information object identifier comprises and account name.

24. The system of claim 23, wherein each resource definition further comprises a schema map.

25. The system of claim 24, wherein each said schema map maps a resource attribute to a virtual attribute.

26. A method of managing information, comprising:

storing an identity index comprising a plurality of information object identifiers corresponding to a set of information objects that define a user of multiple computer resources;

associating a resource definition with each information object identifier, wherein each resource definition corresponds to a different one of the multiple computer resources at which the information object corresponding to the associated information object identifier is located, and wherein each

resource definition contains connection information for the corresponding computer resource.

27. The method of claim 26, wherein each information object identifier from said plurality of information object identifiers comprises a native key for the corresponding information object.

28. The method of claim 27, wherein said native key comprises an account name.

29. The method of claim 26, wherein said associating a resource definition with each information object identifier further comprises associating at least one resource name with each information object identifier.

30. The method of claim 26, wherein each information object comprises a user account.

31. The method of claim 26, wherein each resource definition further comprises a schema map.

32. The method of claim 31, wherein said schema map maps a resource attribute to a virtual attribute.

33. The method of claim 31, further comprising creating a composite view of a user based on said schema map from each resource definition.

IX.   EVIDENCE APPENDIX

No evidence submitted under 37 CFR §§ 1.130, 1.131 or 1.132 or otherwise entered by the Examiner is relied upon in this appeal.

X.   <u>RELATED PROCEEDINGS APPENDIX</u>

There are no related proceedings.